

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

HOUSAM SHOUMAN, JR.

Case: 2:24-mj-30021

Assigned To : Unassigned

Assign. Date : 1/23/2024

CMP: USA v SHOUMAN (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 5, 2022 in the county of Wayne in the
Eastern District of Michigan - SD, the defendant(s) violated:

*Code Section**Offense Description*

Title 21, United States Code Sections
841(a)(1) and 846

Attempted possession with intent to distribute and
conspiracy to distribute controlled substances

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 23, 2024

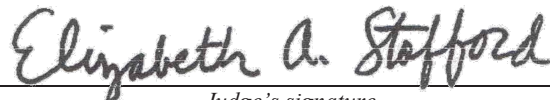
City and state: Detroit, Michigan



Complainant's signature

Daryl Reitzner, Postal Inspector, USPS

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, U.S. Magistrate

Printed name and title

Judge

AFFIDAVIT

I, Daryl Reitzner, being duly sworn on oath, state as follows:

1. I, Daryl Reitzner, am a United States Postal Inspector assigned to the Allen Park Domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. I am assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail. I have been a Postal Inspector since August 2021 when I attended the United States Postal Inspection Service Basic Training Academy in Potomac, MD. Prior to my employment with the USPIS, I was a commissioned police officer with the City of University City Police Department (UCPD) from June 2009 until August 2021. While employed with UCPD, I was a Patrol officer for eight years and a Field Training officer for four years. During my tenure with UCPD, I was tasked with investigating drug violations, crimes against property and crimes against person(s).
2. Since joining the United States Postal Inspection Service, I have received additional training in the detection and investigation of prohibited mailing offenses. My additional training includes working with other experienced

United States Postal Agents in the identification and interdiction of mailed parcels containing contraband. As part of my duties, I investigate incidents wherein the United States Mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, fentanyl and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.

3. The facts contained in this affidavit are based on my review of information provided to me by other law enforcement agents, witnesses, and individuals with knowledge of this matter as well as my personal involvement and investigation and review. The information provided below is for the limited purpose of obtaining the requested criminal complaint and does not contain all details or all facts of which I am aware of involving this investigation.
4. This Affidavit is made in support of an application for a criminal complaint and warrant to arrest Housam Shouman Jr., for violations of Title 21, United States Code, Section 841(a)(1) and 846, possession with intent to distribute and conspiracy to distribute controlled substances.

SUMMARY OF INVESTIGATION

5. On May 5, 2022, Postal Inspectors interdicted a United States Postal Service Priority Mail large mailing box bearing Priority Mail tracking number 9505 5131 7911 2123 7126 72 (subject parcel) addressed to “S. Reynolds 15862 Ridgebrook Path, Romulus, MI 48174” with a listed return address of “Bradley S. 10232 Tanforan Dr. Cypress, CA 90630.” The parcel was mailed on May 3, 2022, from zip code 90630. Further, the parcel weighed approximately 5 pounds, 3.70 ounces and bore \$31.25 in postage and fees.
6. A database used by the Postal Inspection Service revealed that the listed sender, Bradley S, had no known association with the listed origin address. A database used by the Postal Inspection Service revealed that the listed recipient, S. Reynolds, had no known association with the listed destination address.
6. On May 5, 2022, Postal Inspectors met United States Border Patrol (USBP) Agent Ryan Sprague. Agent Sprague brought a narcotics canine named “Myko” to the USPIS Allen Park Domicile located in Allen Park, MI. At approximately 1:00 PM, Postal Inspectors arranged a controlled substance detection test by placing the subject parcel in a lineup with similar parcels in an area at the USPIS Allen Park Domicile. Agent Sprague and K9 Myko were not present during the placement of the parcels in the test area. During the

controlled substance detection test, Postal Inspectors observed Myko examine the area and alert only on the subject parcel by laying down in front of the Subject Parcel.


7. On May 6, 2022, Inspector Bradshaw swore to and obtained federal search warrant 2:22-mc-50879-1. Postal Inspector Bradshaw and Inspector Nissen executed the search warrant and found the following items: a vacuumed sealed Ozark Trail Cooler that contained a bubble mailer with a Priority Mail envelope, with a vacuumed sealed bundle that presumptively tested positive for the properties of heroin, weighing approximately 1,002.7 grams.
8. On May 9, 2022, an anticipatory warrant was obtained from the Honorable Elizabeth Stafford, United States Magistrate Judge, which authorized law enforcement agents to enter and search the 15862 Ridgebrook Path address if the Subject Parcel entered residence.
9. Postal Inspectors and the Drug Enforcement Administration (DEA) conducted a controlled delivery of the Subject Parcel. At the time of the controlled delivery, the Subject Parcel contained a bundle of sham narcotics fashioned to appear to be heroin and to simulate the Subject Parcel's original weight. An electronic device was also placed inside the subject parcel that would electronically alert agents and inspectors when the subject parcel was in motion and when it was opened.

10. On May 9, 2022, at approximately 1:46 PM, A Postal Inspector acting in an undercover capacity as a USPS Mail Carrier, delivered the Subject Parcel to the 15862 Ridgebrook Path address to a black female later identified as Jennifer EDWARDS. EDWARDS took possession of the Subject Parcel and took it into the Ridgebrook Path address, which activated the triggering component of the anticipatory search warrant. Postal Inspectors and the DEA kept surveillance in case any unknown suspects arrived at the Ridgebrook Path address to retrieve the subject parcel.
11. At approximately 4:30 PM, Postal Inspectors and the DEA approached the Ridgebrook Path address, knocked and announced, identifying themselves as law enforcement and announcing they had a search warrant. EDWARDS refused to open the door. Postal Inspectors and the DEA breached the door and executed the anticipatory search warrant. During the entry, EDWARDS attempted to block law enforcement from clearing the upstairs portion of the residence. EDWARDS was escorted away from the staircase for the residence to be cleared for officer safety.
12. After the residence was cleared, Inspector Bradshaw and DEA TFO Janowicz read Edwards her Miranda Rights on IS Form 1067 Advice of Rights. Edwards stated she understood her rights by initialing her rights and requested an attorney.

**VIDEO EVIDENCE OF HOUSAM SHOUMAN JR. MAILING
PARCEL**

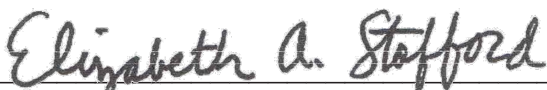
13. Video surveillance was obtained from the Cypress, California Post office for the mailing of the subject parcel. On the video a subject identified as Housam Shouman Jr., was identified as the mailer of the parcel.
14. An IP address used to track the parcel is registered to 8217 Poinsettia Dr., Buena Park, CA 90620. Housam Shouman Jr.'s address according to his California license is 8217 Poinsettia Dr., Buena Park, CA 90620.
15. Based upon the foregoing, there is probable cause to believe Housam Shouman Jr. has knowingly violated Title 21, United States Code, Sections 841(a)(1) and 846, attempted possession with intent to distribute and conspiracy to distribute controlled substances. Accordingly, this Affiant respectfully request that this Court issue a complaint and arrest warrant.

Respectfully submitted,



Daryl Reitzner,
U.S. Postal Inspector

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge